

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMANDA WASHBURN.

Plaintiff,

V.

PORSCHE CARS NORTH AMERICA INC., a
Delaware Corporation,

Defendant.

NO. 2:22-cv-01233-TL

**STIPULATION AND ORDER TO
FILE SECOND AMENDED
COMPLAINT**

**NOTE ON MOTION CALEDNAR:
March 8, 2024**

On September 26, 2023, Plaintiff Amanda Washburn (“Plaintiff”) filed her First Amended Complaint (Dkt. 23) against Defendant Porsche Cars North America, Inc., (“Defendant”). Since filing her First Amended Complaint, the parties have engaged in settlement discussions that have culminated in a near-final settlement proposal. Plaintiff intends to file a motion for preliminary approval of the proposed settlement shortly. As part of the settlement negotiations, the parties have worked to clarify the scope of the settlement class and identity of subject class vehicles. A redlined copy of the proposed Second Amended Complaint is attached hereto as Exhibit A.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their undersigned counsel, subject to the approval of the Court, that Plaintiff should be

1 permitted to file a Second Amended Complaint to amend the class definition and identity of
2 subject class vehicles to conform to the terms of the parties' settlement definitions of the
3 proposed settlement class and settlement class vehicles.

4 DATED this 11th day of March, 2024.

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11 *Attorneys for Defendant Porsche Cars North*
12 *America Inc.*

13 *Attorneys for Plaintiff and the Putative Class*

14

15 **ORDER**

16 IT IS SO ORDERED.

17 Dated this 11th day of March, 2024.

18 
19 Tana Lin
20 United States District Judge